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Attorneys for Defendants
Valley Health System, LLC,
d/b/a Centennial Hills Hospital Medical Center

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AMY VILELA, an individual;
JOZETTE FIGUEREDO, an individual;
AMY VILELA, as Special Administrator of the
Estate of SHALYNNE RAMOS,

vs.

VALLEY HEALTH SYSTEM, LLC, d/b/a
CENTENNIAL HILLS HOSPITAL
MEDICAL CENTER, a Nevada Limited Liability
Company; UNIVERSAL HEALTH SERVICES
OF DELAWARE, INC., a Delaware corporation;
VALLEY HOSPITAL MEDICAL CENER, INC.,
a Nevada Corporation, EMCARE, INC., a
Delaware Corporation; TANYA NETZ PAC; JILL
MCATEE, RN; DOE DEFENDANTS I through
X, inclusive; ROE NURSES I through XX,
inclusive; ZOE HOSPITALS or OTHER
MEDICAL FACILITIES I through X; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

CASE NO.: 2:16-cv-01503-RFB-CVH

STIPULATION AND PROPOSED
ORDER EXTENDING TIME TO
FILE REPLY IN SUPPORT OF
MOTION TO DISMISS (FIRST
REQUEST)

Plaintiffs Amy Vilela ("Viela"), Jozette Figueredo ("Figueredo"), Amy Vilela as the
Special Administrator of the Estate of Shalynne Ramos (the "Ramos Estate") (collectively

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1 "Plaintiffs"); Defendant Valley Health System, LLC, d/b/a Centennial Hills Hospital Medical
2 Center ("Valley Health"); and Defendant Tanya Netz, PAC, ("Netz") hereby stipulate as follows:

3 (1) The due date for Valley Health's Reply in Support of its Motion to Dismiss (Doc
4 #14) is currently October 27, 2016.

5 (2) The parties agree that the due date for the Reply should be extended to November 3,
6 2016.

7 (3) Counsel for Valley Health is currently working on over twenty reply briefs in support
8 of motions *in limine* for a case with a firm trial date. A one-week extension is
9 therefore needed to complete the Reply in this matter.

10 (4) No parties will be prejudiced by the contemplated extension. Discovery has not yet
11 begun, and no trial date is set in this matter.

12 IT IS SO STIPULATED:

13 DATED this 27th day of October, 2016.

DATED this 27th day of October, 2016.

14 HALL PRANGLE & SCHOONVELD, LLC

LAW OFFICES OF CASEY D. GISH

15 /s/: Ryan T. O'Malley

/s/: Casey D. Gish

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Attorneys for Plaintiffs

21 Las Vegas, NV 89144

22 *Attorneys for Defendants Valley Health*
23 *System, LLC, d/b/a Centennial Hills Hospital*
24 *Medical Center*

25 DATED this 27th day of October, 2016.

26 JOHN H. COTTON & ASSOCIATES

27 /s/: Todd Weiss

28 TODD WEISS, ESQ.

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Attorneys for Defendant Tanya Netz, PAC

Amy Vilela, et al. vs. Valley Health System, LLC, et al.
Case No.: 2:16-cv-01503-RFB-CVH

ORDER

Pursuant to the terms of the attached stipulation, the Court orders as follows:

1. Good cause exists for extension of the due date for Valley Health Systems, LLC's Reply in Support of its Motion to Dismiss (Doc. #14).
2. The due date for the Reply is extended to November 3, 2016.



RICHARD F. BOULWARE, II

United States District Judge

DATED this 3rd day of November, 2016.

Respectfully Submitted:

HALL PRANGLE & SCHOONVELD, LLC

/s/: Ryan T. O'Malley

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